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October 5, 2015

**VIA ELECTRONIC MAIL AND ON ECF.**

Honorable Stuart M. Bernstein, U.S.B.J.  
UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK,  
Hamilton Customs House-One Bowling Green,  
New York, New York 10004.

**Re: *In re Integrated Structures Corp.*;  
Chapter 11 Case No. 15-B-12703-SMB.**

Honorable Judge Bernstein:

We represent Integrated Structures Corp., debtor in possession ("Debtor") in the above-captioned case (the "Bankruptcy Case"), which filed its voluntary chapter 11 petition last Friday, October 2, 2015 ("Filing Date").

At the time of the Filing Date, a trial was scheduled to begin on Monday, October 5, 2015 before United States District Judge Forrest in the case styled, *Trustees of the New York City District Council of Carpenters' Pension Fund, et al. v. Integrated Structures Corp.* 11-CV-8975 (the "District Court Case"). After final settlement negotiations were unsuccessful on the day before the Filing Date, and while the parties were engaged in final depositions on the Filing Date, the Debtor's management concluded that it was compelled to file its emergent petition.

Debtor's trial counsel in the District Court Case advised plaintiff's counsel in the District Court Case of the filing of the Bankruptcy Case immediately following such filing, and also advised of the automatic imposition of the stay of the trial and all proceedings in the District Court Case. Plaintiff's counsel thereafter filed an *Emergency Motion for Relief from Stay to Permit Trial to Proceed on October 5, 2015* with this Court [Docket entry no. 4] ("Lift Stay Motion"). As of this writing, no hearing has been scheduled for the Lift Stay Motion.

Importantly, also after being notified of Debtor's filing, plaintiff's counsel submitted a letter on the Filing Date to District Judge Forrest, and consequently obtained an order from the

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Court, entered Saturday, October 3, 2015, adjourning the trial in District Court Case to Tuesday, October 6, 2015. (We attach copies of counsel's letter and the District Judge Forrest's Order.)

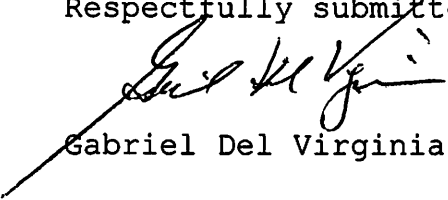
As there has been no adjudication of the Lift Stay Motion upon proper notice and a hearing, we respectfully submit that the trial and all proceedings in the District Court are stayed, notwithstanding District Judge Forrest's order, and we respectfully request that Your Honor endorse this letter accordingly.

We are available to address this matter today should the Court wish to hear from the parties.

No previous request for the relief sought herein has been made.

We thank the Court for its consideration of the foregoing submission and request.

Respectfully submitted,



Gabriel Del Virginia

Attachments.

Copies to:

Chambers of Hon. Katherine B. Forrest, U.S.D.J. (*Via electronic mail and ECF*);  
Marc A. Tenenbaum, Esq. (*Via electronic mail only*);  
Alan B. Pearl, Esq. (*Via electronic mail only*); and  
Frank Michael Graziadei, Esq. (*Via electronic mail only*).



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**Adam Biggs**  
Of Counsel  
abiggs@vandallp.com

October 2, 2015

**VIA ECF**

Honorable Katherine B. Forrest  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Trustees of the New York City District Council of Carpenters Pension  
Fund, et al. v. Integrated Structures Corp. (11 Civ. 8975 (KBF))**

Dear Judge Forrest:

We are the attorneys for the Plaintiffs in the above-referenced action. We submit this letter requesting an adjournment of the trial date set for October 5, 2015. On October 2, 2015, Plaintiffs learned, during Defendant's Court ordered depositions, that Defendant Integrated Structures Corp. filed for bankruptcy in the United States Bankruptcy Court for the Southern District of New York, *In Re Integrated Structures Corp.*, 15-12703. Plaintiffs are currently in the process of filing an emergency application in the bankruptcy proceedings, pursuant to 11 U.S.C. § 362(d), to lift the automatic stay and allow this case to begin on Tuesday October 6, 2015.

In light of the short notice of Defendant's bankruptcy filing, and in order to allow Plaintiffs an opportunity to present their request to the Bankruptcy Court, Plaintiffs seek to have the trial dates moved to October 6, 2015 and October 7, 2015. Due to the late hour, Plaintiffs were unable to get an audience with the Bankruptcy Court today. After speaking to the clerk of the Bankruptcy Court, it appears likely we will be heard by the Bankruptcy Court sometime on Monday.

This is Plaintiffs second request for an adjournment of the trial date in connection with Plaintiffs' summary judgment filings, which was denied.

The Court's considerations are appreciated.

Respectfully submitted,



VIRGINIA  
& AMBINDER LLP  
A t t o r n e y s   a t   L a w

/s  
Adam Biggs

cc: Frank Michael Graziadei, Esq. (counsel for Defendant)(via ECF)  
Alan B. Pearl, Esq. (counsel for Defendant)(via ECF)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: October 3, 2015

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: TRUSTEES OF THE NEW YORK CITY DISTRICT:  
: COUNCIL OF CARPENTERS PENSION FUND, :  
: WELFARE FUND, ANNUITY FUND, :  
: APPRENTICESHIP, JOURNEYMAN :  
: RETRAINING, EDUCATIONAL AND INDUSTRY :  
: FUND, CHARITY FUND, THE NEW YORK CITY :  
: AND VICINITY CARPENTERS LABOR- :  
: MANAGEMENT CORPORATION, AND THE :  
: DISTRICT COUNCIL FOR NEW YORK CITY :  
: AND VICINITY, UNITED BROTHERHOOD OF :  
: CARPENTERS AND JOINERS OF AMERICA, :  
:

Plaintiffs, :

-v- :

INTEGRATED STRUCTURES CORP., :

Defendant. :  
: -----X

11-cv-8975 (KBF)

ORDER

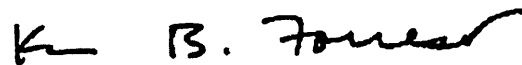
KATHERINE B. FORREST, District Judge:

The Court is in receipt of Plaintiffs' October 2, 2015 letter. (ECF No. 108.)

The trial scheduled for October 5, 2015 is hereby adjourned to October 6, 2015.

SO ORDERED.

Dated: New York, New York  
October 3, 2015



KATHERINE B. FORREST  
United States District Judge